

**IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND**

**STATE OF MARYLAND** :  
  
                  **v.** : **Crim. No. C-10-CR-23-000516**  
**TOMMY CUPP,** :  
  
                  **Defendant** :

**DEFENDANT'S DEMAND FOR BILL OF PARTICULARS**

The Defendant, Tommy Cupp through his attorney, Rachel Reyes, assistant public defender pursuant to Maryland Rule 4-241 respectfully requests that the State provide a bill of particulars. In support thereof the Defendant states:

**1. The Defendant requests that the State disclose the following as to Count**

**One (Sex Abuse of a Minor):**

- a.) Specify the locations of the alleged sexual abuse;
- b.) Specify the number of contacts forming the alleged sexual abuse;
- c.) State all facts that tend to prove that the Defendant is a blood relative;
- d.) State all facts that tend to prove that the Defendant is a relative by adoption;
- e.) State all facts that tend to prove that the Defendant is a relative by marriage;
- f.) State all facts that tend to prove that the Defendant committed incest;
- g.) State all facts that tend to prove that the Defendant rape;
- h.) State all facts that tend to prove that the Defendant committed sexual offense in any degree;
- i.) State all facts that tend to prove that the Defendant committed sodomy;

- j.) State all facts that tend to prove that the Defendant committed unnatural or perverted sexual practice;
- k.) State all facts that tend to prove that the Defendant committed an act involving sexual molestation;
- l.) State all facts that tend to prove that the Defendant committed an act involving sexual exploitation;
- m.) State all facts that tend to prove that J.C. sustained physical injuries as a result of the Defendant's alleged sexual abuse.

2. **The Defendant requests that the State disclose the following as to Count**

**Two Rape-Second Degree:**

- a.) State all facts that tend to prove that the Defendant engaged in vaginal intercourse with another by force, threat of force, without the consent of the other, and;
- b.) State all facts that tend to prove that the Defendant engaged in vaginal intercourse where the alleged victim is:
  - i. a mentally defective individual;
  - ii. a mentally incapacitated individual;
  - iii. a physically helpless individual
- c.) State all facts that tend to prove that the Defendant knows or should reasonably know that the alleged victim is:
  - i. a mentally defective individual;
  - ii. a mentally incapacitated individual;
  - iii. a physically helpless individual.

d.) State all facts that tend to prove that the alleged victim is under the age of 14 years and that the Defendant is at least 4 years older.

/s/Rachel Reyes

/s/ Rachel Reyes  
Rachel Reyes, Esq.  
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#### **CERTIFICATE OF SERVICE**

I hereby certify on June 28, 2023, a copy of the foregoing Demand For Bill of Particulars was electronically served through MDEC on the State's Attorney's Office for Frederick County.

/s/Rachel Reyes  
Assistant Public Defender